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3 THE HONORABLE JAMAL WHITEHEAD
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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 AMELIA SAPPHIRE, individually and as)
11 class representative,)
12 vs. Plaintiff,) NO. 2:24-cv-00032-JNW
13 FRED MEYER STORES, INC.,)
14 Defendant.) STIPULATION TO AWARD TO
15) PLAINTIFF ATTORNEY FEES
16) INCURRED AS A RESULT OF
17) REMOVAL
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This stipulation comes before the Court on an order to remand and an award of attorney fees to Plaintiff.

On September 27, 2024, U.S. District Judge Jamal N. Whitehead granted Plaintiff's motion to remand this case to King County Superior Court. Judge Whitehead further granted Plaintiff's motion for an award of attorney fees and costs.

Following remand, the parties agreed to stipulate to a reduced award of attorney fees. The parties now hereby stipulate and agree for the Court to award attorney fees to Plaintiff in the amount of \$40,000. The parties ask this Court to set \$40,000 as the amount of attorney fees and costs awarded by the Court per the Court's order of September 27, 2024. The parties further

1 stipulate that such payment shall be made by Defendant no later than 14 days from the date of the
2 Court's order granting the parties' stipulation.

3 IT IS SO STIPULATED:

4 On behalf of Plaintiff:

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7 Damian S. Mendez, WSBA No. 36157

On behalf of Defendant:

Ed Choi

Ed Choi, OSB No. 135673 (*pro hac vice*)

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CERTIFICATE OF SERVICE

The undersigned certified under penalty of perjury under the laws of the State of Washington that on the date below indicated I electronically filed the foregoing with the Clerk of the Court using CM/ECF system which will send notification of such to the following:

Attorneys for Defendant Fred Meyer Stores, Inc.

Susan K. Stahlfeld, WSBA No. 22003 susan.stahlfeld@millernash.com

David E. Worley, WSBA No. 46948 dave.worley@millernash.com

Ed Choi, OSB No. 135673 (*pro hac vice*) ed.choi@millernash.com

MILLER NASH LLP

605 5th Ave S, Ste 900

Seattle, WA 98104

Telephone: (206) 624-8300

Facsimile: (206) 340-9599

DATED this 2nd Day of October, 2024.

MENDEZ LAW GROUP, PLLC

/s/ Damian S. Mendez

Damian S. Mendez, WSBA #36157

**STIPULATION TO AWARD TO PLAINTIFF ATTORNEY FEES
INCURRED AS A RESULT OF REMOVAL - 3**

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12 WESTERN DISTRICT OF WASHINGTON
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16 AMELIA SAPPHIRE, individually and as)
17 class representative,)
18 Plaintiff,) NO. 2:24-cv-00032-JNW
19 vs.)
20 FRED MEYER STORES, INC.,)
21 Defendant.) (PROPOSED)
22) ORDER GRANTING PARTIES'
23) STIPULATION TO AWARD TO
24) PLAINTIFF ATTORNEY FEES
25) INCURRED AS A RESULT OF
REMOVAL

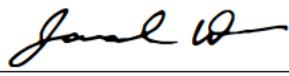
1 THIS MATTER coming to this Court upon a Stipulation to Award to Plaintiff Attorney
2 Fees Incurred as a Result of Removal, and the Court being fully appraised after reviewing the
3 record and finding the stipulation to be in order, NOW THEREFORE,

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6 IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that Stipulation to Award
7 to Plaintiff Attorney Fees Incurred as a Result of Removal is hereby GRANTED.
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11 (PROPOSED) ORDER GRANTING PARTIES' STIPULATION TO
12 AWARD TO PLAINTIFF ATTORNEY FEES AS A RESULT OF
13 REMOVAL - 1

14 MENDEZ LAW GROUP, PLLC
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1 DATED this 7th day of October, 2024.
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4 THE HONORABLE JAMAL WHITEHEAD

5 Presented by:
6

MENDEZ LAW GROUP, PLLC

/s/ Damian S. Mendez

Damian S. Mendez, WSBA #36157

BENNETT HARTMAN, LLP

/s/ Richard B. Myers

Richard B. Myers, WSBA #53893

10 Attorneys for Plaintiff
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(PROPOSED) ORDER GRANTING PARTIES' STIPULATION TO
AWARD TO PLAINTIFF ATTORNEY FEES AS A RESULT OF
REMOVAL - 2

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David E. Worley, WSBA No. 46948 dave.worley@millernash.com

Ed Choi, OSB No. 135673 (*pro hac vice*) ed.choi@millernash.com

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DATED this 2nd Day of October, 2024.

MENDEZ LAW GROUP, PLLC

/s/ Damian S. Mendez

Damian S. Mendez, WSBA #36157